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5 UNITED STATES DISTRICT COURT
6 EASTERN DISTRICT OF WASHINGTON AT SPOKANE

7 K.S. by her guardian ad litem Kenneth L.
Isserlis, and DOROTHY SPIOTTA and
PAUL SPIOTTA,

8 Plaintiffs,

9 v.

10 AMBASSADOR PROGRAMS, INC.,
11 AMBASSADORS GROUP, INC.,
PEOPLE TO PEOPLE
12 INTERNATIONAL,

13 Defendants.

No. CV-08-243-RMP

DECLARATION OF CHRIS BARONE
IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT
RE: CHOICE OF LAW ON FRAUD,
CPA AND NEGLIGENCE CLAIMS

14
15 CHRIS BARONE on oath declares as follows:

16 I am a paralegal at MacDonald Hoague & Bayless assigned to this
17 case, and have personal knowledge of its discovery files and records.

18 1. Exhibit 1 is a true and correct copy of excerpts of Interrogatory No. 1
19 of Ambassador Defendants Responses to Plaintiffs' Second Requests for
20 Production and First Interrogatories to Ambassadors Inc.

21 2. Exhibit 2 is a true and correct copy of excerpts of the Deposition of
22 Mary Jean Eisenhower.
23

1 3. Exhibit 3 is a true and correct copy of the online search for People to
2 People International Student Chapters in the State of Virginia.

3 4. Exhibit 4 is a true and correct copy of excerpts of Plaintiffs' First
4 Supplemental Initial Disclosures.

5 5. Exhibit 5 is a true and correct copy of AMB000001 (with minor
6 names redacted), correspondence dated September 8, 2005 addressed to K.S.

7 6. Exhibit 6 is a true and correct copy of AMB000002 (with minor
8 names redacted), correspondence dated October 7, 2005 addressed to the parents of
9 K.S.

10 7. Exhibit 7 is a true and correct copy of excerpts of the Deposition of
11 Joel Hoadley.

12 8. Exhibit 8 is a true and correct copy of excerpts of the Deposition of
13 Edna Nalls.

14 9. Exhibit 9 is a true and correct copy of excerpts of the Deposition of
15 Sarah Hobbs.

16 10. Exhibit 10 is a true and correct copy of AMB000010, correspondence
17 dated November 16, 2005 addressed to K.S.

18 11. Exhibit 11 is a true and correct copy of SPIOTTA00238, People to
19 People Student Ambassador Programs Certificate of Acceptance for K.S.

20 12. Exhibit 12 is a true and correct copy of excerpts of the Deposition of
21 Katherine Calvert.

22 13. Exhibit 13 is a true and correct copy of excerpts of the Deposition of
23 Van Hofmann.

1 14. Exhibit 14 is a true and correct copy of excerpts of the Deposition of
2 Dawn Hotaling.

3 15. Exhibit 15 is a true and correct copy of excerpts of the Deposition of
4 Paul Spiotta dated February 18, 2009.

5 16. Exhibit 16 is a true and correct copy of AMB643, the Leader Success
6 Program.


7 17. Exhibit 17 is a true and correct copy of AMB002317, the 2006
8 Australia Delegation's Flight Times.

9 18. Exhibit 18 is a true and correct copy of excerpts from the March 12,
10 2009 Deposition of Jeffrey Thomas.

11
12 I swear under penalty of perjury under the laws of the United States
13 that the above is true to the best of my knowledge.

14
15 DATED at Seattle, Washington, this 12th day of April, 2010.

16
17 MACDONALD HOAGUE & BAYLESS

18
19 By 
20 Chris Barone

CERTIFICATE OF SERVICE

I hereby certify that on April 12th, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Kenneth L Isserlis**
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MACDONALD HOAGUE & BAYLESS

By



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Katherine C. Chamberlain, WSBA #40014

Attorneys for Plaintiffs